



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 18, 2017

BY ELECTRONIC MAIL and ECF

Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York

**Re: United States v. Matthew Madonna, et al.,
S1 17 Cr. 89 (CS)**

Dear Judge Seibel:

The Government writes to update the Court regarding the status of its production of discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure.

Since the June 1, 2017 conference in this matter, the discovery produced to defendants Caldwell and Londonio under the original indictment has been provided to all counsel who have returned a signed draft transcript stipulation to the Government (the large majority).

At the June 1 conference, the Government estimated that the second round of discovery (the first round of discovery under the superseding indictment) would require four to six weeks to collect and produce. While the dissemination of these materials was delayed slightly due to technical difficulties, the Government is currently in the process copying the second round of discovery to hard drives we have received from defense counsel. The second production includes over 300 consensual recordings and summaries, dozens of jail calls, and audio files and line sheets for over 10 wiretaps. Because each hard drive can require several hours to image, the Government expects to begin mailing out the hard drives later this week and to complete production of the second round of discovery next week.

Additionally, as discussed at the June 1 conference, the Government expects to make additional productions within the coming weeks.

Finally, in order to ensure the proper handling of the discovery material, the parties respectfully request that the Court enter the enclosed proposed protective order, which has been

consented to by all parties. The terms of this order are substantially the same as those of the order that the Court entered under the original indictment in this matter.

Respectfully submitted,

JOON H. KIM
Acting United States Attorney

By: _____/s/_____

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